EXHIBIT B

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Attorneys for Merck Sharp & Dohme Corp.

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

IN RE INCRETIN-BASED THERAPIES PRODUCTS LIABILITY LITIGATION *As to All Related and Member Cases*	Case No. 13-md-2452-AJB-MDD **DEFENDANT MERCK SHARP & DOHME CORP.'S AMENDED RESPONSES AND OBJECTIONS TO PLAINTIFFS' GENERAL CAUSATION REQUESTS TO PRODUCE** Judge: Hon. Anthony J. Battaglia Magistrate: Hon. Mitchell D. Dembin

Defendant Merck Sharp & Dohme Corp. ("Merck"), pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, sets forth below its Responses and

c. The production of documents shall be consistent with the stipulated and entered Order Governing the Production of Electronically Stored Information (Doc. No. 187).

d. Merck's responses are made subject to and without waiving any objections as to relevance, materiality or admissibility.

e. Merck objects to the term "nonclinical" as vague and ambiguous.

f. Merck objects to these requests as irrelevant and overbroad insofar as they seek information from time periods that are prior to any time period relevant to the drugs JANUVIA® and JANUMET® at issue in this case, as defined in the stipulated and entered Order Governing the Production of Electronically Stored Information (Doc. No. 187) as beginning in 1999.

RESPONSES AND OBJECTIONS TO REQUESTS TO PRODUCE

REQUEST NO. 1: The DOCUMENTS identified in YOUR answers to Plaintiffs' General Causation Interrogatories to Defendant Merck Sharp & Dohme Corp.

RESPONSE: Merck has produced documents identified in its answers to Plaintiffs' General Causation Interrogatories.

REQUEST NO. 2: The IND/NDA and any SNDAs for JANUVIA AND/OR JANUMET in native electronic searchable format as maintained by YOU.

RESPONSE: Merck has produced its IND and NDA files for JANUVIA® and JANUMET® through February 28, 2014, in accordance with the ESI protocol.

REQUEST NO. 3: All other correspondence, data and other DOCUMENTS that YOU provided to or received from the FDA related to the safety of JANUVIA